



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 19, 2007

Clay Parker Davis, Treasurer
Help America's Leaders Political
Action Committee (HALPAC)
1155 21st Street NW, Suite 300
Washington, DC 20036

Response Due Date:
October 22, 2007

Identification Number: C00376038

Reference: Mid-Year Report (1/1/07-6/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) of your report to clarify the following description(s): "PAC derby fundraiser expenses," "PAC fundraising event expense," "PAC fundraising event expenses," "PAC 1120 POL payment," "PAC fundraising expense," "PAC fundraising retainer/expenses," "PAC political fundraising fee," "PAC lodging expense for fundraising eve," "PAC fundraising retainer/fundraising eve," and "PAC fundraising retainer." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
2. Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect

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